



Ashland Chemical Company

DIVISION OF ASHLAND OIL, INC.

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ENGINEERING DEPARTMENT
R. O. Spooner
Director of Engineering

CERTIFIED MAIL

April 21, 1983

APR 25 1983

8AW-WM
Permits 5.

Mr. Larry Wapensky, Section Chief
Hazardous Waste Permitting Section
U.S. EPA Region 8AW-WM
1860 Lincoln Street
Denver, Colorado 80295

Subject: Part A Application To Store Hazardous Waste

Dear Mr. Wapensky:

Based upon our interpretation of the EPA memorandum dated July 31, 1981 (Attachment I), interim status is granted by statute when: (A) a facility was in existence on or before November 19, 1980, (B) an owner or operator complied with the Section 3010 notification requirements (Attachment II), and (C) a Part A application (Attachment III) is filed within 30 days of when the facility becomes subject to 40 CFR 265. We believe that the Ashland Chemical Company plant located in Sheridan, Colorado meets these conditions for interim status to store drummed waste.

- (1) The distribution facility was purchased by Ashland Chemical Company from Charter International Oil Company in 1980. The EPA notification form identifies waste routinely generated, transported, and stored at chemical distribution plants. After November 19, 1980, our Industrial Chemicals & Solvents (IC&S) distribution locations attempted to change activities that involved handling waste. The attached "position paper" addresses the reasons why changes were made and has already been submitted to other EPA regional offices. Included with the position paper are concurrence letters we have received from some of the EPA regional offices.
- (2) Planned changes in activities at the Sheridan facility after November 19, 1980, included: (A) storage for 90-days or less of any wastes that might be generated at the plant and (B) termination of transfer station activities (transportation/storage) for customer waste. Plant wastes consist of organic solvent mixtures generated from line flushes, hose disconnections and valve drippings collected in catch pans prior to transfer/storage in 55-gallon drums and organic

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solvents (off-spec) returned by our customers due to a formulation error. Usually both the organic solvent mixtures and off-spec solvents are exempt from RCRA because we can beneficially resell, reuse, reclaim, etc., the solvents.

The decision to eliminate all customer waste service in certain situations had an adverse impact upon customer/vendor relationship. Some customers believe Ashland should assist in the movement of waste to disposal or reclamation sites for spent products generated from the chemical products we sell/distribute. As a result, we have entered into business agreements with Chemical Waste Management, Inc. and permitted reclaimers. For the Sheridan plant, customer waste will ultimately be disposed of at the Port Arthur, Texas or Emelle, Alabama locations.

Please call me if you need additional information or you believe a meeting is necessary.

Very truly yours,



David L. Anderson
Environmental Engineer

DLA/cmg

Attachments